

CONYERS

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5 July 2023

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Honourable Martin Glenn
Chief United States Bankruptcy Judge
United States Bankruptcy Court
Southern District of New York
One Bowling Green, Courtroom 523
New York, NY 10004-1408

By email and ECF

Dear Chief Judge Glenn

RE All Year Holdings Limited, Case No. 21-12051 (MG)

We (Conyers Dill and Pearman) act as British Virgin Islands (“**BVI**”) Counsel to All Year Holdings Limited (“**the Company**”) and the (former) Joint Provisional Liquidators of the Company.

Following the Court’s directions at the hearing of our Final Fee Application on Tuesday, 27 June 2023, we are most grateful for the opportunity to submit amended time records for the Court’s consideration.

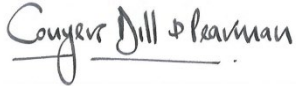
Noting the Court’s specific reference to certain time entries of Mr Robert Briant (*Partner – Corporate*), he has reviewed and revised those (and other) time entries. Although no specific comment was made in respect of Mr Richard Evans (*Partner – Restructuring*) or Mr Charles Goldblatt (*Associate – Restructuring*); noting the Court’s general comments on “*block billing*”, both have reviewed and revised their time entries with a view to breaking down any grouped time entries. We have filed an amended application which includes an updated Exhibit B (time records).

We are grateful for the Court’s recognition of the difference in approach and requirements in respect of time recording and billing between jurisdictions. Conyers does not operate in the United States and our work in this matter was limited exclusively to matters within the jurisdiction of the BVI Commercial Court, which applies different requirements upon practitioners, albeit with substantially the same intention of ensuring that the fees and expenses charged to any company in an insolvency setting are both reasonable and proportionate.

We hope that this Court will be reassured by the fact that Conyers' fees and expenses incurred from the outset of, throughout and to the conclusion of the Provisional Liquidation of the Company (December 2021 to April 2023) were subject to the approval of the BVI Commercial Court. On two occasions, substantive applications for the approval of Conyers' fees and expenses were submitted to the BVI Commercial Court and were, in both instances, approved.

We are available to assist should the Court have any further questions.

Yours faithfully,

A handwritten signature in cursive script that reads "Conyers Dill & Pearman". The signature is written in dark ink and is positioned above a horizontal line.

Conyers Dill & Pearman